

DOCKET NO. NNH-CV-22-6120210-S : SUPERIOR COURT
BOSIE KIMBER, ET AL. : J. D. OF NEW HAVEN
V. : AT NEW HAVEN
RENEE DOMINGUEZ : MARCH 11, 2022

JOINT STIPULATION OF FACTS

In accordance with the order of the Court, *Kamp, J.*, the plaintiffs, Bosie Kimber and Donarell Elder, and the defendant, Renee Dominguez, jointly stipulate to the following facts which form the basis of this action in quo warranto:

1. The plaintiffs, Bosie Kimber and Donarell Elder, are New Haven residents and taxpayers with standing to pursue this action.
2. The defendant, Renee Dominguez, in her capacity as the Acting Chief of Police of the City of New Haven, is a Public Officer whose title to office may be challenged in a quo warranto proceeding. The defendant joined the New Haven Police Department on October 16, 2002 and since then has been continuously employed by the City of New Haven as a member of the Police Department in various positions.
3. On June 30, 2021, Chief Otoniel Reyes retired and vacated the office of the Chief of Police of the City of New Haven. At the time the defendant was an Assistant Chief of Police.
4. On July 1, 2021, Assistant Chief Renee Dominguez was appointed by Mayor Justin Elicker to assume that vacant office and began serving as Acting Chief of Police of the City of New Haven.

5. On December 6, 2021, Mayor Elicker timely submitted the defendant's nomination for permanent Chief of Police to the Board of Alders at a public meeting.

6. At that December 6, 2021 public meeting, the Board of Alders rejected Acting Chief Dominguez's nomination by a voice vote, triggering a thirty (30) day period within which the Mayor could resubmit Acting Chief Dominguez's nomination for approval by the Board of Alders.

7. On December 10, 2021, prior to resubmission of her nomination, Acting Chief Dominguez withdrew her name from further consideration as permanent Chief of Police and announced her intention to retire pending the completion of a search for a new permanent Chief of Police.

8. Following that announcement, on December 10, 2021, Mayor Elicker requested the defendant to remain in the office of the Chief of Police in an acting capacity until a new permanent Chief of Police was found.

9. At all times since July 1, 2021 and continuing to the present day, Acting Chief Dominguez has held appointed title to the Office of the Chief of Police of the City of New Haven, and has exercised the rights, responsibilities, and duties of that office.

THE PLAINTIFFS
BOISE KIMBER AND DONARALL ELDER

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Jerald S. Barber
Their Attorney

THE DEFENDANT
RENEE DOMINGUEZ

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